

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

In re: Equifax, Inc. Customer Data Security Breach Litigation) MDL Docket No. 2800
) Case No.: 1:17-md-2800-TWT
)
) This document relates to:
)
) FINANCIAL INSTITUTIONS TRACK
)

**FINANCIAL INSTITUTION PLAINTIFFS' UNOPPOSED MOTION
FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

The Financial Institution Plaintiffs¹ move under Rule 23(e) of the Federal Rules of Civil Procedure for preliminary approval of a proposed class action settlement between themselves and Defendants Equifax Inc. and Equifax Information Services LLC.

Under the proposed Agreement, if approved, Equifax will agree to: 1) pay up to \$5.5 million directly to settlement class members who submit valid claims; 2) spend a minimum of \$25 million over a period of two years towards data security measures pertinent to the Financial Institution Plaintiffs and their claims; 3) pay all

¹ The remaining named Financial Institution Plaintiffs are: Army Aviation Center Federal Credit Union, ASI Federal Credit Union, Bank of Louisiana, Consumers Cooperative Credit Union, Elements Financial Federal Credit Union, Firefly Credit Union, First Financial Credit Union, Halliburton Employees' Federal Credit Union, Heritage Federal Credit Union, Hudson River Community Credit Union, Peach State Federal Credit Union, SeaComm Federal Credit Union, Services Credit Union, Seven Seventeen Credit Union, Sky Federal Credit Union, State Employees Federal Credit Union (SEFCU), Summit Credit Union, Suncoast Credit Union, The Summit Federal Credit Union, Washington Gas Light Federal Credit Union, and Wright-Patt Credit Union.

reasonable settlement administration and notice costs; and 4) pay reasonable, Court-approved attorneys' fees, expenses, and named plaintiff service awards, up to agreed-upon limits.

The Financial Institution Plaintiffs move for an order: (1) preliminarily approving the proposed settlement; (2) preliminarily certifying the proposed settlement class; (3) approving the proposed notice program; and (4) scheduling a final approval hearing.

In further support of their motion, the Financial Institution Plaintiffs submit a memorandum of law, a proposed preliminary approval order; the Joint Declaration of Class Counsel Gary F. Lynch and Joseph P. Guglielmo; the proposed settlement agreement and its various attachments—such as the proposed notices and claim form—(attached as Exhibit A); and a Declaration of Richard W. Simmons, from the proposed Settlement Administrator, Analytics Consulting LLC.

Plaintiffs respectfully request that this Motion, which Equifax does not oppose, be granted.

Dated: May 15, 2020

Respectfully submitted,

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CERTIFICATE OF COMPLIANCE

Pursuant to L.R. 7.1D, the undersigned certifies that the foregoing complies with the font and point selections permitted by L.R. 5.1B. This brief was prepared on a computer using the Times New Roman font (14 point).

Respectfully submitted this 15th day of May, 2020.

s/ Gary F. Lynch

Gary F. Lynch

CERTIFICATE OF SERVICE

I hereby certify that on May 15, 2020, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notice of electronic filing to all counsel of record.

s/ Gary F. Lynch

Gary F. Lynch